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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,

vs.

GEORGE GILMORE,

Defendant.

Case No. 3:19-cr-00029-AET

**NOTICE OF CROSS-MOTION TO
EXCLUDE EVIDENCE OF THE DETAILS
OF DEFENDANT'S PERSONAL
EXPENDITURES**

Oral Argument Requested

TO: Matthew J. Skahill
Attorney in Charge, Camden Branch
U.S. Attorney's Office
District of New Jersey
401 Market Street, 4th Floor
Camden, New Jersey 08101-2098

Jihee G. Suh
Assistant United States Attorney
U.S. Attorney's Office
District of New Jersey
970 Broad Street
Newark, New Jersey 07102

PLEASE TAKE NOTICE that at such date and time as determined by the Court, Defendant, George Gilmore ("Gilmore"), through his attorneys, Marino, Tortorella & Boyle, P.C. (Kevin H. Marino, Esq., appearing) will move before the Honorable Anne E. Thompson, U.S.D.J., United States District Court for the District of New Jersey, Clarkson S. Fisher Federal Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for entry of an Order excluding evidence of the details of his personal expenditures pursuant to Federal Rules of Evidence 401 and 403.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Gilmore will rely on

the contemporaneously-filed Memorandum of Law and the attachments thereto.

PLEASE TAKE FURTHER NOTICE that Gilmore respectfully requests oral argument on this motion.

Dated: March 14, 2019
Chatham, New Jersey

Respectfully submitted,

MARINO, TORTORELLA & BOYLE, P.C.
Attorneys for Defendant George Gilmore

By: 
KEVIN H. MARINO